

J-54170

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE

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DANIEL LOVELACE and  
HELEN LOVELACE, Individually,  
and as Parents of BRETT LOVELACE,  
Deceased,

Plaintiffs,

VS.

NO. 2:13-cv-02289 dkv  
JURY TRIAL DEMANDED

PEDIATRIC ANESTHESIOLOGISTS, P.A.;  
BABU RAO PAIDIPALLI; and  
MARK P. CLEMONS,

Defendants.

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**DEFENDANT MARK P. CLEMONS, M.D.'S SUPPLEMENTAL  
DESIGNATION OF FRCP 26(a)(2)(B) EXPERT WITNESSES AND  
PHYSICIANS/MEDICAL PROVIDERS NOT EMPLOYED AS EXPERTS**

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Defendant, Mark P. Clemons, M.D., by and through the undersigned counsel of record, pursuant to FRCP 26(a)(2)(B), supplements his Designation of FRCP 26(a)(2)(B) Expert Witnesses and Physicians/Medical Providers Not Employed as Experts filed herein on May 9, 2014, as follows:

1. Defense Expert Witnesses: The following individuals may be used at trial to present evidence under Federal Rules of Evidence 702, 703 or 705:

(B.) Jay Werkhaven, M.D.  
Otolaryngologist  
Vanderbilt University Medical Center  
2200 Children's Way  
Doctor's Office Tower, 7<sup>th</sup> Floor  
Nashville, TN 37232

- (i) Subject matter, facts and opinions, and summary of grounds: See Exhibit "B" attached hereto.

Respectfully submitted,

LEWIS THOMASON

By: /s/ J. Kimbrough Johnson  
J. KIMBROUGH JOHNSON (7953)  
MARCY D. MAGEE (19360)  
Attorneys for Defendant,  
Mark P. Clemons, M.D.  
2900 One commerce Sq., 40 S. Main St.  
Memphis, TN 38103  
(901) 525-8721

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the following has been served on Mark Ledbetter, Attorney for Plaintiffs, Halliburton & Ledbetter, 254 Court Avenue, Suite 305, Memphis, TN 38103, and Karen Koplon, Jerry Potter and Bradley Gilmer, Attorneys for Defendants, Babu R. Paidipalli & Pediatric Anesthesiologists, P.A., Hardison Law Firm, 119 S. Main St., Suite 800, Memphis, TN 38103, via U.S. Mail, postage prepaid, this 12<sup>th</sup> day of May, 2014.

/s/ J. Kimbrough Johnson  
Marcy D. Magee